

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICHARD MUNCH, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SPROUT SOCIAL, INC., JUSTYN
HOWARD, RYAN BARRETTO, and JOE
DEL PRETO,

Defendants.

Case No.: 1:24-cv-03867

Hon. Jeffrey I. Cummings

CLASS ACTION

CITY OF HOLLYWOOD POLICE
OFFICERS' RETIREMENT SYSTEM,
Individually and on behalf of all others
similarly situated,

Plaintiff,

v.

SPROUT SOCIAL, INC., JUSTYN
HOWARD, RYAN BARRETTO, and JOE
DEL PRETO,

Defendants.

Case No.: 1:24-cv-05582

Hon. Jeffrey I. Cummings

CLASS ACTION

Consolidated Cases

**DEFENDANTS' MOTION FOR LEAVE TO FILE AN OVERLENGTH BRIEF IN
SUPPORT OF THEIR MOTION TO DISMISS THE CONSOLIDATED CLASS ACTION
COMPLAINT**

NOW COME Defendants Sprout Social, Inc, (“Sprout”) Justyn Howard, Ryan Barretto, Joe Del Preto, and Jason Rechel (the “Individual Defendants” and collectively the “Defendants”), by and through their attorneys, respectfully requesting leave to file a Brief of 50 pages in support of their Motion to Dismiss. In support of their Motion, Defendants state as follows:

1. The complaint in this matter (the “Consolidated Amended Complaint” “or “CAC”) contains 305 paragraphs and is 128 pages. It alleges a purported fraud scheme that spans over a three-year period. The CAC names five different defendants, four individual defendants and one corporate defendant, and alleges that the individual defendants made dozens of supposed false and misleading statements in violation of the federal securities laws.

2. In their brief in support of their Motion to Dismiss, Defendants detail why these purported misrepresentations fail to state a claim under the Private Securities Litigation Reform Act. The brief outlines multiple grounds for each statement’s dismissal, including failure to plead falsity with particularity, failure to plead material misstatements, failure to plead scienter, and failure to plead loss causation. In light of the breadth of plaintiff’s allegations, Defendants were unable in good faith to keep this brief within the 15-page limit, as specified by Local Rule 7.1, and required 50 pages to fully and fairly address these arguments.

3. As required by Local Rule 7.1, the oversized brief also includes a Table of Contents and Table of Authorities to aid the Court and Plaintiffs in reviewing the filing.

4. Defendants’ counsel consulted with Plaintiffs’ counsel concerning this request, who took no position on Defendants’ motion but respectfully requested a commensurate page extension if the Court grants Defendants' requested page extension.

5. WHEREFORE, Defendants respectfully request leave to file an oversized Brief of 50 pages in support of their Motion to Dismiss.

Dated: March 24, 2025

WINSTON & STRAWN LLP

By: /s/ Dane Drobny
Dane Drobny
35 West Wacker Drive
Chicago, IL 60601-9703
Telephone: (312) 558-5600
Email: ddrobny@winston.com

Matthew L. DiRisio (*pro hac vice*)
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 294-4686
Email: mdirisio@winston.com

Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Motion for Leave to File Oversized Brief in Support of Defendants' Motion to Dismiss was filed electronically with the Clerk of the Court and served on all counsel of record via CM/ECF system on March 25, 2025.

/s/ [DRAFT]
Dane Drobny